

EXHIBIT

“L”

Invoice submitted to:
Schoolcraft

December 04, 2015

Invoice #10032

Professional Services

			<u>Hrs/Rate</u>	<u>Amount</u>
2/16/2013 JL	Review of case history and complaint; document preparation for presentation to DOJ		3.50 575.00/hr	2,012.50
2/17/2013 JL	Review of case files and and audio recordings; document preparation to formally request DOJ intervention		3.25 575.00/hr	1,868.75
2/18/2013 JL	Review of case timeline and document preparation for Main Justice and US Attorney presentation		4.00 575.00/hr	2,300.00
2/19/2013 JL	Telephone conference with EDNY Civil Rts Chief Pam Chen; document preparation.		0.75 575.00/hr	431.25
2/20/2013 JL	Prepare draft letters to DOJ--Main Justcie and USAO, EDNY		1.50 575.00/hr	862.50
2/21/2013 JL	Telephone conference with Peter Gleason and client Schoolcraft in reference to case preparation for trial (DOJ letter review).		1.25 575.00/hr	718.75
3/20/2013 JL	Final Draft, review and mail of letters to Main Justice and US Attorney		1.50 575.00/hr	862.50
4/1/2013 JL	Meeting with Peter Gleason to prepare for client meeting April 7 and court appearance April 10		1.00 575.00/hr	575.00
4/9/2013 JL	Meeting with Nat Smith to prepare for Hearing April 10, 2013		2.50 575.00/hr	1,437.50
4/10/2013 JL	Court: Hearing re discovery before Judge Sweet - SDNY, 500 Pearl Street, NYC. Meeting w/Smith to review hearing and discovery plan.		3.25 575.00/hr	1,868.75

Schoolcraft			Page	2
		<u>Hrs/Rate</u>	<u>Amount</u>	
4/11/2013	JL	Meeting with R. Koshets; Nat Smith; Peter Gleason; Gilbert to review NYPD pending internal charges v. client	2.75 575.00/hr	1,581.25
4/25/2013	JL	Meeting with Adrian Schoolcraft and Nat Smith to prepare client for depositions; review status of case	1.25 575.00/hr	718.75
4/26/2013	JL	Meeting with Adrian Schoolcraft and Nat Smith to prepare for depositions	5.75 575.00/hr	3,306.25
4/27/2013	JL	Meeting with Schoolcraft and Nat Smith to prepare for depositions.	5.50 575.00/hr	3,162.50
5/9/2013	JL	Meeting with Nat Smith to review and prepare discovery, engage investigator and prepare depositions	3.25 575.00/hr	1,868.75
5/12/2013	JL	Review of audio recordings made by client; sort and prepare summaries .	4.50 575.00/hr	2,587.50
5/13/2013	JL	Meet investigator Helena Melisi; review case re engagement as investigator	2.75 575.00/hr	1,581.25
5/16/2013	JL	Telephone call with Nat Smith and Helena Melisi re: NYPD reinstatement options for AS.	0.75 575.00/hr	431.25
	JL	Review of IAB reports of interviews with individual officers	2.75 575.00/hr	1,581.25
5/17/2013	JL	Telephone call with Nat Smith 3:30-4:15 and draft email re: strategy for NYPD departmental hearing June 17-18, 2013.	1.50 575.00/hr	862.50
	JL	Review of IAB interviews of individual defendants and others; prepare notes	4.25 575.00/hr	2,443.75
5/18/2013	JL	Review of IAB interviews; telephone call with Nat Smith and AS re: strategy for NYPD departmental hearing	3.50 575.00/hr	2,012.50
5/21/2013	JL	Meeting with Nat Smith and telephone call with James McCutcheon re: NYPD departmental trial strategy	2.25 575.00/hr	1,293.75
6/5/2013	JL	Appearance in court; Sweet, J. redpositions and discovery status; post hearing conf w/Smith	1.75 575.00/hr	1,006.25
6/7/2013	JL	Meeting with potential expert witnesses, Dr. Tom Litwack, Dr. Eli Silverman and Dr. John Eterno; introduction of Nat Smith to experts	2.50 575.00/hr	1,437.50
6/9/2013	JL	Review and edit of Memorandum and proposed Order for filing with Court	1.00 575.00/hr	575.00
6/26/2013	JL	Meeting with client and Nat Smith - Johnston New York Holiday Inn. 7 hours are travel time billed separately	5.50 575.00/hr	3,162.50

Schoolcraft

Page 3

			<u>Hrs/Rate</u>	<u>Amount</u>
6/26/2013	JL	Travel for meeting with client and Nat Smith - Johnston New York Holiday Inn.	7.00 287.50/hr	2,012.50
7/10/2013	JL	Meeting with client and co-counsel Smith in Albany NY. Full review of discovery and trial posture. (7 hr travel)	5.00 575.00/hr	2,875.00
	JL	Travel for meeting with client and Nat Smith--Albany	7.00 287.50/hr	2,012.50
8/6/2013	JL	Confirm with Tom Litwack meeting re: Expert Witness participation	0.75 575.00/hr	431.25
8/7/2013	JL	Meeting with trial illustrator (11am-1pm). Meeting with potential expert witness, Dr. Tom Litwack - (3pm-5pm).	3.50 575.00/hr	2,012.50
8/24/2013	JL	Telephone conference with Smith re invest report on DCPI Brown	0.50 575.00/hr	287.50
8/27/2013	JL	Client meeting at, Saugerties, NY. with Nat Smith; Review case status and strategy with client. [7 hr travel]	5.50 575.00/hr	3,162.50
	JL	Travel from NYC to Saugerties and return for client meeting	7.00 287.50/hr	2,012.50
9/4/2013	JL	Prepare biweekly status report for client;; review motion status and prepare case report.	1.50 575.00/hr	862.50
9/10/2013	JL	Review of documents in preparation for client's examination before trial	4.50 575.00/hr	2,587.50
9/13/2013	JL	Prepare status report for client	0.50 575.00/hr	287.50
9/25/2013	JL	Prepare for hearing on discovery (1.0); Oral Argument re: discovery - USDC SDNY Sweet, J (.75.); consultation with client and Smith in preparation for depositions (4.75)	6.50 575.00/hr	3,737.50
9/26/2013	JL	Representation of client along with co-counsel Smith in examination before trial by defendant Mauriello and NYC - Walter Kretz law office 444 Madison Avenue, NY.	9.00 575.00/hr	5,175.00
9/27/2013	JL	Co-counsel with Smith in representation of client at deposition of client by defendant Mauriello and Jamaica Hospital defendants - Callan, Koster, Brady & Brennan, LLP - One Whitehall Street, 10th Floor New York, NY 10004.	9.00 575.00/hr	5,175.00
9/30/2013	JL	Review of Mauriello examination before trial notes.	0.75 575.00/hr	431.25

Schoolcraft		Page	4
		Hrs/Rate	Amount
10/4/2013 JL	Preparing docs and audio recordings for Marino deposition; Tel Conf with Smith	2.75 575.00/hr	1,581.25
10/7/2013 JL	Meeting with client and Smith re depositions of Mauriello and Marino	3.50 575.00/hr	2,012.50
10/8/2013 JL	co-counsel w/Smith in deposition of Marino; post depo confer /Smith and client	9.00 575.00/hr	5,175.00
10/9/2013 JL	Telephone conference with Smith and client re case status after Marino depo	0.50 575.00/hr	287.50
10/10/2013 JL	Telephone conference with Smith re depositions	0.50 575.00/hr	287.50
10/13/2013 JL	Telephone conference with Smith and NYACLU re assistance in case	0.75 575.00/hr	431.25
10/14/2013 JL	Telephone conference with Smith re status of case and share of responsibilities	0.75 575.00/hr	431.25
10/16/2013 JL	co-counsel at deposition Dfnt Bernier - 111 Broadway- by H. Suckle	1.75 575.00/hr	1,006.25
JL	Prepare deposition of defendant Lauterborn (1.25). Hearing re: Discovery and Defendant Mauriello counterclaim - USDC, SDNY, Judge Sweet (.75). Review of hearing results (.50); prepare report for client (2.75)	5.25 575.00/hr	3,018.75
10/23/2013 JL	Telephone conference with Smith re PD expert report and testimony; Tel Conf w/Eterno	1.50 575.00/hr	862.50
10/25/2013 JL	Appearance in court re attorney video of deposition--Bernier	0.75 575.00/hr	431.25
11/1/2013 JL	Review docs and audio for Lauterborn deposition	2.75 575.00/hr	1,581.25
11/7/2013 JL	Prepare and take w/Smith examination before trial of defendant Lauterborn. Review documents and audio recordings; prepare exhibits.	9.50 575.00/hr	5,462.50
11/13/2013 JL	Motion hearing at Judge Sweet Courtroom; review of hearing outcome w/co-counsel; draft report to client.	3.75 575.00/hr	2,156.25
11/14/2013 JL	Review of hospital and NYPD files and audio recordings in preparation for examination before trial of Bernier and Mauriello.	5.50 575.00/hr	3,162.50
11/17/2013 JL	Review of client Schoolcraft examination before trial.	2.25 575.00/hr	1,293.75

Schoolcraft		Page	5
		Hrs/Rate	Amount
11/18/2013 JL	Consultation with non-party witnesses, audio recordings of IAB interviews and document review.	2.50 575.00/hr	1,437.50
11/21/2013 JL	Review and produce Marino and Lauterborn video depositions; reconcile Plaintiff depositions transcript with video.	2.75 575.00/hr	1,581.25
11/22/2013 JL	Mauriello terminated examination before trial preparation; review of Court's decision and additional City discovery documents provided.	2.75 575.00/hr	1,581.25
11/24/2013 JL	Review of Plaintiff's depositions (1.00); review defendant Mauriello and Lauterborn depositions and produce videos (2.25); prepare status report (.75).	4.00 575.00/hr	2,300.00
11/26/2013 JL	Review of depositions; prepare challenge to City Defendant obstructions; prepare for Lt. Caughey examination before trial.	5.50 575.00/hr	3,162.50
11/27/2013 JL	Review of examination before trial transcripts with video; prepare for Defendant Caughey examination.	2.75 575.00/hr	1,581.25
11/29/2013 JL	Review of Marino and Lauterborn depositions re response City's Refusal to Allow Witness to Respond and otherwise interferes with the examination before trial.	2.00 575.00/hr	1,150.00
11/30/2013 JL	Review of dfnt Marino and Lauterborn examination before trial research for motion to compel and additional requests for production.	2.50 575.00/hr	1,437.50
12/1/2013 JL	Review of Marino and Lauterborn examinations before trial to identify areas for motion to compel and additional requests for production.	1.75 575.00/hr	1,006.25
12/2/2013 JL	Telephone conference with Smith and client re case status of depositions	1.50 575.00/hr	862.50
12/7/2013 JL	Telephone conference with Smith re Mauriello counterclaim	0.50 575.00/hr	287.50
12/9/2013 JL	Prepare and 2d seat with Smith examination before trial for dfnt Caughey; meeting with Peter Kelley re potential assistance in trial prep.	7.75 575.00/hr	4,456.25
12/11/2013 JL	Represent client (w/Bauza) at depo of Larry Schoolcraft--Albany [8:30 travel time]	6.50 575.00/hr	3,737.50
JL	Amtrak NYC - Albany - NYC for Larry Schoolcraft deposition (w/Bauza)	8.50 287.50/hr	2,443.75
12/18/2013 JL	Prepare for defendant Mauriello examination before trial; review of motion for reconsideration.	3.25 575.00/hr	1,868.75
12/19/2013 JL	Prepare for Mauriello examination before trial.	2.75 575.00/hr	1,581.25

Schoolcraft		Page	6
		<u>Hrs/Rate</u>	<u>Amount</u>
12/20/2013 JL	Represent client with Smith at Mauriello examination before trial at Scoppetta Seiff Kretz & Abercrombie.	9.50 575.00/hr	5,462.50
12/24/2013 JL	Telephone conference with Smith and client re case status and possible settlement range	0.75 575.00/hr	431.25
12/26/2013 JL	Meeting with Smith, Bauza and client to review Mauriello EBT; review settlement parameters	2.00 575.00/hr	1,150.00
12/29/2013 JL	Meeting with client, Smith and Bauza re status and go-forward; review audio recordings	2.50 575.00/hr	1,437.50
12/30/2013 JL	Confer with John Curran re Stroz Friedberg analysis of recording device and audio enhancement.	1.25 575.00/hr	718.75
1/2/2014 JL	Telephone conference with Smith re status and schedule of depositions	0.75 575.00/hr	431.25
1/3/2014 JL	Preparing docs and audio for Sgt Huffman and PAA Boston depositions	2.50 575.00/hr	1,437.50
1/6/2014 JL	co-counsel w/Smith depositions of Huffman and Boston; post EBT review w/Smith and Bauza	9.50 575.00/hr	5,462.50
1/10/2014 JL	Prepare case files and review audio records for future depositions	2.00 575.00/hr	1,150.00
1/12/2014 JL	Prepare for Hanlon deposition; review docs and audio files	1.75 575.00/hr	1,006.25
1/13/2014 JL	co-counsel w/Smith at Hanlon deposition	8.50 575.00/hr	4,887.50
1/15/2014 JL	Appearance in court, Sweet, J. re discovery; confer with Smith and Bauza re status	1.50 575.00/hr	862.50
1/29/2014 JL	Preparing for Lamstein deposition	2.00 575.00/hr	1,150.00
1/30/2014 JL	conduct as co-counsel w/Smith Lamstein deposition	8.50 575.00/hr	4,887.50
2/3/2014 JL	Telephone conference with Smith re deposition schedules	0.50 575.00/hr	287.50
2/4/2014 JL	Prepare and review discovery demands.	1.50 575.00/hr	862.50
2/5/2014 JL	Conference with Smith re: discovery demands.	1.75 575.00/hr	1,006.25

Schoolcraft			Page	7
		<u>Hrs/Rate</u>	<u>Amount</u>	
2/6/2014	JL Conference call with client re: discovery.	1.00 575.00/hr	575.00	
2/10/2014	JL Preparing depositions of Bernier and Isakof; review NYS 9.39	2.50 575.00/hr	1,437.50	
2/11/2014	JL Deposition of defendant Dr. Bernier.111 B'Way--co-counsel with Smith and Suckel	8.50 575.00/hr	4,887.50	
2/12/2014	JL co-counsel with Smith and Suckle at deposition of Defendant Dr. Isakov.	7.50 575.00/hr	4,312.50	
2/13/2014	JL Review with Smith notes and exhibits of depositions of Bernier and Isakov.	1.00 575.00/hr	575.00	
2/16/2014	JL Telephone conference with client and Smith re case status and way ahead	1.25 575.00/hr	718.75	
2/18/2014	JL Review of discovery demands with counsel and client.	1.50 575.00/hr	862.50	
2/19/2014	JL Review of correspondence re: discovery demands. tel conf client and Smith re discovery	1.75 575.00/hr	1,006.25	
2/23/2014	JL Telephone conference. Smith re depositions	0.75 575.00/hr	431.25	
2/24/2014	JL Review file to prepare examination before trial material for Gough.	1.50 575.00/hr	862.50	
2/25/2014	JL Prepare examination before trial materials for Weiss.	0.75 575.00/hr	431.25	
2/26/2014	JL Prepare examination before trial materials for Duncan.	0.50 575.00/hr	287.50	
2/27/2014	JL Prepare examination before trial Marquez.	0.50 575.00/hr	287.50	
JL	Prepare for Sangianetti.	0.50 575.00/hr	287.50	
2/28/2014	JL Prepare examination before trial docs for Sergeant James.	0.75 575.00/hr	431.25	
3/3/2014	JL Prepare examination before trial materials for Broschart.	0.75 575.00/hr	431.25	
3/4/2014	JL Counsel conference call. Smith re status and strategy. Needs for trial preparation.	1.50 575.00/hr	862.50	

Schoolcraft			Page	8
		<u>Hrs/Rate</u>	<u>Amount</u>	
3/5/2014	JL	Review discovery and depositions; update case status report for client	1.25 575.00/hr	718.75
	JL	Prepare examination before trial materials for Timothy Trainor.	0.50 575.00/hr	287.50
3/7/2014	JL	Draft, review and edit correspondence re: discovery.	1.25 575.00/hr	718.75
	JL	Research re: NYS CPL 190.25(4).	0.75 575.00/hr	431.25
3/9/2014	JL	Review research re: response to City Defendants non-production.	1.00 575.00/hr	575.00
3/10/2014	JL	Schoolcraft research for response to discovery and deposition issues and hearing.	3.50 575.00/hr	2,012.50
3/11/2014	JL	Schoolcraft research and draft letter to court re: discovery and deposition issues (4.00); confer w/co-counsel (1.00)	5.00 575.00/hr	2,875.00
3/12/2014	JL	Schoolcraft preparation for Hearing re: discovery.	2.50 575.00/hr	1,437.50
3/13/2014	JL	Hearing and conference. SDNY Sweet, J., re discovery status	0.75 575.00/hr	431.25
	JL	Schoolcraft preparation fr Hearing re: discovery.	2.50 575.00/hr	1,437.50
3/14/2014	JL	Review scheduling for examination before trial.	0.75 575.00/hr	431.25
3/16/2014	JL	Update case status report; Prep plaintiff demands in discovery and re-schedule depositions.	2.00 575.00/hr	1,150.00
3/17/2014	JL	Review schedule of examination before trial w Smith and opposing counsel.	1.50 575.00/hr	862.50
3/18/2014	JL	Review and consultation with Mauriello counsel re: scheduling of inspection in Johnstown, New York; related discovery review and research.	1.25 575.00/hr	718.75
3/19/2014	JL	Review City Defendants production requests; research and prepare response and plaintiff production demands. Tel conf with client.	4.50 575.00/hr	2,587.50
3/21/2014	JL	Review City Defendants' correspondence re: discovery demands.	0.75 575.00/hr	431.25
3/24/2014	JL	Prepare deposition schedules in consult with Smith and defendants counsel. Review discovery and prep motion draft.	3.75 575.00/hr	2,156.25

Schoolcraft

Page 9

			<u>Hrs/Rate</u>	<u>Amount</u>
3/25/2014 JL	Review City Defendants' supplemental discovery demands.	0.75 575.00/hr	431.25	
3/26/2014 JL	Appearance in court for hearing re discovery status and issues (.75); prep plaintiff discovery production (2.75).	3.50 575.00/hr	2,012.50	
3/27/2014 JL	Prepare, review, and edit correspondence re 30(b)(6) examination before trial.	1.50 575.00/hr	862.50	
3/28/2014 JL	Finalize Plaintiff 30(b)(6) notices. Prepare examination of City 30(b)(6) witnesses	3.25 575.00/hr	1,868.75	
3/30/2014 JL	Review jury instructions with Magdelena.	1.00 575.00/hr	575.00	
3/31/2014 JL	Consultation re: settlement context strategy and demands. (Smith and client)	1.50 575.00/hr	862.50	
4/1/2014 JL	Prepare trial memorandum/ telephone call to City re: settlement/ and prepare for Trainor and Gough examination before trial.	2.75 575.00/hr	1,581.25	
4/2/2014 JL	Prepare draft trial memorandum.	1.50 575.00/hr	862.50	
4/3/2014 JL	Review terms and strategy re: settlement negotiations. Smith and client.	1.50 575.00/hr	862.50	
4/4/2014 JL	Review correspondence to Court re: referral to Magistrate; consult re: settlement strategy.	1.00 575.00/hr	575.00	
4/7/2014 JL	Review filings (ECF posts) and correspondence.	1.50 575.00/hr	862.50	
4/9/2014 JL	Review settlement strategy with client; Hearing .	2.25 575.00/hr	1,293.75	
4/10/2014 JL	Prepare/conduct w co-counsel Smith examination before trial of Trainor.	8.25 575.00/hr	4,743.75	
4/11/2014 JL	Prepare/conduct as co-counsel w/ Smith examination before trial of Gough.	7.50 575.00/hr	4,312.50	
4/13/2014 JL	Meet possible Psychiatric expert Dr. Lubit; review case and discuss Dr. Lubit's participation.	2.75 575.00/hr	1,581.25	
4/14/2014 JL	Telephone conference with client, Smith and MJ Freeman re: settlement demands and discovery issues.	1.50 575.00/hr	862.50	
4/15/2014 JL	Review ECF filing by JHC defendant.	0.50 575.00/hr	287.50	

Schoolcraft

Page 10

		<u>Hrs/Rate</u>	<u>Amount</u>
4/16/2014 JL	Meeting with Smith (1.25); research on jury verdicts/awards (2.25); telephone conference with client to discuss settlement and trial issues (1.00).	4.50 575.00/hr	2,587.50
4/17/2014 JL	Schoolcraft settlement research (1.00); consultation with Smith (1.00); telephone conf with Schoolcraft re: settlement issues (1.25).	3.25 575.00/hr	1,868.75
4/18/2014 JL	Research on detention verdicts (.75), discussion and planning re: settlement (1.00); telephone call with defense counsel (.50). Tel conf with client and Smith (.75)	3.00 575.00/hr	1,725.00
4/25/2014 JL	Prepare/conduct w/Smith examination before trial for Sawyer.	6.25 575.00/hr	3,593.75
4/26/2014 JL	Telephone conference with client and Smith re: settlement.	1.00 575.00/hr	575.00
4/27/2014 JL	Telephone conference with client re: settlement and trial strategy re: medical defendants and PTS.	1.50 575.00/hr	862.50
4/28/2014 JL	Prepare/conduct w/Smith examination before trial: Duncan.	7.50 575.00/hr	4,312.50
4/29/2014 JL	Schoolcraft meeting (client and Smith) re: settlement strategy and discovery schedule.	1.50 575.00/hr	862.50
4/30/2014 JL	Schoolcraft hearing with Judge Sweet re: discovery (.75); post hearing consultation with Smith and Henry Steinglass re: trial strategy (2.75).	3.50 575.00/hr	2,012.50
5/1/2014 JL	Conference w/Smith re: prior counsel fees/expenses; brief client on settlement issues; research re: use/abuse of psychiatry for political intimidation and retaliation.	1.75 575.00/hr	1,006.25
5/2/2014 JL	Review and confer (all counsel) with re: deposition schedules; review case law re: settlement (range of awards of involuntary confinement, false arrest...).	1.75 575.00/hr	1,006.25
5/5/2014 JL	Telephone conference with Smith re proposed mtn to compel	0.50 575.00/hr	287.50
5/6/2014 JL	Research and confer with Nat Smith re: settlement issues (1.00); discussion with client re: settlement (1.25); preparation of status report (.75).	3.00 575.00/hr	1,725.00
5/7/2014 JL	Prepare and review response to City Motion re: 30(b)(6) EBT.	1.00 575.00/hr	575.00

Schoolcraft

Page 11

			<u>Hrs/Rate</u>	<u>Amount</u>
5/8/2014 JL	Prepare for settlement conference (1.25); conference call with Magistrate Freeman re: settlement (.75); review settlement negotiations (2.00); research and outreach to proposed ER Medicine expert (1:00).		4.50 575.00/hr	2,587.50
5/9/2014 JL	Review hospital records; City production re: 081 lockers; prepare status report.		1.25 575.00/hr	718.75
5/10/2014 JL	Consultation and correspondence with Nat Smith re: City defendants' discovery production re: 081 lockers; prepare EBT of Sgt James.		2.50 575.00/hr	1,437.50
5/11/2014 JL	Consultation by telephone with Dr. Halpern-Ruder re: EMT and ER procedures as potential expert witness; review correspondence with client.		2.00 575.00/hr	1,150.00
5/12/2014 JL	Preparation/conduct w/Smith EBT of Sgt Shantel James; EBT Sgt James 10am-3:30pm; review of EBT; follow up with Dr. Halpern-Ruder; EMT/ER expert.		7.00 575.00/hr	4,025.00
5/13/2014 JL	meet (w/Smith) with potential witness for plaintiff; NYPD Lt (Ret) Joseph Ferrara; telephone conference with Chris Dunne re: possible settlement issues; prepare EBTs of the EMTs. [POV travel to-from Holbrook NY--3:00]		4.50 575.00/hr	2,587.50
JL	Drive (Lenoir's POV) from 111 Broadway, NY, NY to Long Island to meet with Lt Ferrara (ret)		3.00 287.50/hr	862.50
5/14/2014 JL	EBT (w/Smith) of Marquez, EMT/JHC; prepare status report.		7.50 575.00/hr	4,312.50
5/15/2014 JL	Preparation/conduct w/Smith EBT of Sanetti; EMT/JHC; preparation - conduct post depo-review with Smith.		5.25 575.00/hr	3,018.75
JL	Review of EBT; review case and settlement strategy with client and Smith		1.75 575.00/hr	1,006.25
5/16/2014 JL	Prepare EBT for Broschart - review City motion to strike 30(b)(6) issues.		2.50 575.00/hr	1,437.50
5/19/2014 JL	Prepare for meeting with client and full status review of discovery; settlement and trial strategy.		2.25 575.00/hr	1,293.75
5/20/2014 JL	Consultation with client re: discovery; settlement and trial strategy; settlement conference call with Magistrate Freeman and client; Verizon "Hot Spot" internet connectivity device for client communication.		5.50 575.00/hr	3,162.50
JL	POV (Lenoir) 111 Broadway; NYC to Johnston, N Y and return for consultation with client re: discovery; settlement and trial strategy; and settlement		7.00 287.50/hr	2,012.50

Schoolcraft

Page 12

			<u>Hrs/Rate</u>	<u>Amount</u>
5/27/2014 JL	Research and outreach re: potential Law Enforcement expert(s) research re: damages and settlement issues.	2.00 575.00/hr	1,150.00	
5/28/2014 JL	Preparation for hearing (1.50); hearing re: EBT City 30(b)(6) issues (.75); review court holdings (.75); prepare Weiss EBT (4.50).	7.50 575.00/hr	4,312.50	
5/30/2014 JL	Review w/co-counsel EBT Jamaica Hospital 30(b)(6); Skype conference with client (:30).	1.50 575.00/hr	862.50	
5/31/2014 JL	Skype conference with client to review discovery, etc.	1.00 575.00/hr	575.00	
6/2/2014 JL	Telephone conference with client (1.25); prepare additional discovery requests (1.25); review status of discovery received from defendants (2.00).	4.50 575.00/hr	2,587.50	
6/4/2014 JL	Represent (with Smith) Ferrara at City deposition, 100 Church St	4.50 575.00/hr	2,587.50	
JL	Meeting with Smith and Ferrara to prepare for examination before trial; review EBT materials: documents and audio.	3.50 575.00/hr	2,012.50	
6/6/2014 JL	Telephone conference with law enforcement experts; call with John Eterno and Eli Silverman; review and discuss law enforcement expert report and testimony; prepare status report for client and trial team.	2.75 575.00/hr	1,581.25	
6/9/2014 JL	Telephone conference with client; preparation and review discovery and settlement issues.	2.00 575.00/hr	1,150.00	
6/11/2014 JL	(with Smith) Prepare and meet with Dr. Dan Halpern-Ruder in Providence RI re proposed EMT and ER expert.	4.00 575.00/hr	2,300.00	
JL	Drive POV (Lenoir's) from 111 Broadway to Providence, RI to meet with Dr. Dan Halpern proposed EMT and ER expert	4.50 287.50/hr	1,293.75	
6/12/2014 JL	Return drive POV (Lenoir's) to 111 Broadway NYC from Providence, RI for meeting with Dr. Dan Halpern proposed EMT and ER expert.	4.00 287.50/hr	1,150.00	
6/13/2014 JL	Telephone conference with Eterno and Silverman re: law enforcement expert research and testimony; review and preparation of retainer agreements.	2.00 575.00/hr	1,150.00	
6/16/2014 JL	Prepare status report for client; draft trial memo	1.75 575.00/hr	1,006.25	
6/18/2014 JL	Prepare for and conduct (with Smith) Broschart examination before trial; review notes.	7.50 575.00/hr	4,312.50	
6/19/2014 JL	Status update on discovery schedule for client and trial team.	1.00 575.00/hr	575.00	

Schoolcraft

Page 13

			<u>Hrs/Rate</u>	<u>Amount</u>
6/20/2014 JL	Telephone conference with co-counsel re: law enforcement experts; draft retainer agreements.	2.00 575.00/hr	1,150.00	
6/21/2014 JL	Draft and review law enforcement expert retainer agreement.	0.50 575.00/hr	287.50	
6/23/2014 JL	Prepare for, and conduct with Smith dfnt Duncan examination before trial; review Duncan examination before trial.	7.50 575.00/hr	4,312.50	
6/25/2014 JL	Telephone conference with party counsel and co-counsel re: discovery scheduling.	1.00 575.00/hr	575.00	
6/26/2014 JL	Telephone conference with client, co-counsel and psychiatric expert re: meeting with client; call with co-counsel re: examination before trial scheduling.	2.00 575.00/hr	1,150.00	
6/27/2014 JL	Meeting (telephone conference) with client; co-counsel and expert re: evaluation by psychiatric expert.	2.50 575.00/hr	1,437.50	
6/29/2014 JL	Telephone conference with client; co-counsel and expert (Lubit) re: scheduling of evaluation meeting.	1.00 575.00/hr	575.00	
6/30/2014 JL	Meeting with client (2.00); arrange meeting with psychiatric expert (2.00); conference with Dr. Lubit; call with client re: evaluation (1.25).	5.25 575.00/hr	3,018.75	
7/1/2014 JL	Prepare and conduct w/Smith examination before trial for Mauriello. Review w/client and Smith.	8.50 575.00/hr	4,887.50	
7/2/2014 JL	Telephone conference with client re: deposition review and trial preparation; Adrian departs NYC via Amtrak	1.00 575.00/hr	575.00	
7/3/2014 JL	Prepare and review w/Smith re: Dr. Lwin's examination before trial.	3.50 575.00/hr	2,012.50	
7/4/2014 JL	Prepare for 30(b)(6) depositions and other JHC witnesses.	3.75 575.00/hr	2,156.25	
7/7/2014 JL	Prepare for and attend deposition as co-counsel; and review; 30(b)(6) witness to testify about JHMC's policy on involuntary hospitalization.	4.50 575.00/hr	2,587.50	
7/8/2014 JL	Schedule and plan remaining depositions (2.00); review final discovery productions (2.50).	4.50 575.00/hr	2,587.50	
7/9/2014 JL	Negotiate expert agreements with Dr. Silverman and Dr. Eterno; draft retainer contracts; conference call to resolve issues, finalize expert agreement and schedule meetings and reports; and prepare for City 30(b)(6) examination before trial.	1.75 575.00/hr	1,006.25	
7/10/2014 JL	Consultation and negotiation with psych and law enforcement experts; revise retainer agreements.	2.25 575.00/hr	1,293.75	

Schoolcraft

Page 14

			<u>Hrs/Rate</u>	<u>Amount</u>
7/11/2014 JL	Arrange and negotiate terms for ER MD expert witness; prepare for City examination before trial.	1.75 575.00/hr	1,006.25	
7/14/2014 JL	Prepare for City 30(b)(6) examination before trial.	2.25 575.00/hr	1,293.75	
7/15/2014 JL	Conduct two City 30(b)(6) examinations before trial.	7.50 575.00/hr	4,312.50	
7/16/2014 JL	Conduct two City 30(b)(6) examination before trial.	7.00 575.00/hr	4,025.00	
7/17/2014 JL	Conduct two City 30(b)(6) examination before trial.	7.00 575.00/hr	4,025.00	
7/18/2014 JL	Prepare, do, and review telephone call with MD expert; client and co-counsel.	2.50 575.00/hr	1,437.50	
7/21/2014 JL	Review of discovery and depositions.	1.50 575.00/hr	862.50	
7/22/2014 JL	Status conference with Smith and client.	1.25 575.00/hr	718.75	
7/30/2014 JL	Telephone conference with Smith and LE experts re repost	0.75 575.00/hr	431.25	
7/31/2014 JL	Preparing letter to Court; tel conf w/Smith and LE experts	1.50 575.00/hr	862.50	
8/1/2014 JL	Draft case status report; update Trial Memorandum.	1.50 575.00/hr	862.50	
8/4/2014 JL	Telephone conference with LE experts; Eterno and Silverman with Nat Smith.	1.00 575.00/hr	575.00	
8/5/2014 JL	Discovery review; review letter to Court re: outstanding issues; finalize status report.	2.50 575.00/hr	1,437.50	
8/6/2014 JL	Review and summarize depositions; confer w/Smith re: expert reports.	1.75 575.00/hr	1,006.25	
8/7/2014 JL	Review depositions; prepare index and summaries; confer re: expert testimony and reports.	2.50 575.00/hr	1,437.50	
8/8/2014 JL	Review depositions; index and summarize; plan expert report submission and prepare for depositions.	2.25 575.00/hr	1,293.75	
8/9/2014 JL	Confer w/Smith re: expert reports; conference call with LE experts.	2.00 575.00/hr	1,150.00	

Schoolcraft

Page 15

			<u>Hrs/Rate</u>	<u>Amount</u>
8/10/2014 JL	Review expert reports; conference calls with psychiatric expert.	2.50 575.00/hr	1,437.50	
8/11/2014 JL	Plaintiff's expert disclosure due; prepare packages and send.	4.25 575.00/hr	2,443.75	
8/14/2014 JL	Research and review existing material re: expert depositions and dispositive motions.	1.50 575.00/hr	862.50	
8/15/2014 JL	Prepare for depositions of plaintiff's experts.	1.50 575.00/hr	862.50	
8/16/2014 JL	Telephone conference with Nat Smith re: expert report follow up and depositions.	1.00 575.00/hr	575.00	
8/18/2014 JL	Respond to City Defendant letter re: expert reports; review and index depositions.	2.50 575.00/hr	1,437.50	
8/19/2014 JL	Review deposition summaries; draft correspondence re: discovery issues.	2.50 575.00/hr	1,437.50	
8/20/2014 JL	Draft response to City Defendants letter re:30(b)(6) witness; also renew demands for production of Marino and other discovery documents.	4.75 575.00/hr	2,731.25	
8/21/2014 JL	Telephone conference with Smith re: case scheduling with Larry Schoolcraft (.75); draft response to medical defendants re: depositions of Dr. Patel and Dr. Lwin and City Defendants re: discovery issues (1.25); complete Adrian Schoolcraft 2nd deposition summary (2.50).	4.50 575.00/hr	2,587.50	
8/22/2014 JL	Confer with all expert witnesses re: schedule availability for depositions.	1.25 575.00/hr	718.75	
8/26/2014 JL	Confer with experts re: additional information on reports; and schedule availability; review defendant Mauriello letter to dismiss charges.	1.75 575.00/hr	1,006.25	
8/29/2014 JL	Review Court Order re: discovery; confer with Smith.	1.50 575.00/hr	862.50	
9/2/2014 JL	Confer with co-counsel on expert discovery response, schedule of depositions.	1.50 575.00/hr	862.50	
9/4/2014 JL	Schedule of expert depositions (.75); review defendants letter motion re: expert reports and depositions (1.25); prepare for expert depositions (1.50).	4.50 575.00/hr	2,587.50	
9/5/2014 JL	Confer with co-counsel re: expert reports and depositions; prepare response to defendants' letter motion re: expert reports and deposition schedules; organize further deposition summaries.	3.50 575.00/hr	2,012.50	

Schoolcraft		Page	16
		<u>Hrs/Rate</u>	<u>Amount</u>
9/6/2014	JL Review process of summarizing deposition transcripts; confidentiality agreement, billing procedures, etc. with legal assistants.	2.00 575.00/hr	1,150.00
9/7/2014	JL Review PD expert Silverman prior research.	1.50 575.00/hr	862.50
9/8/2014	JL Confer with co-counsel re: expert discovery; schedule and deposition strategy; review Monel law and facts.	2.75 575.00/hr	1,581.25
9/10/2014	JL Review with all counsel expert witness deposition schedule and outstanding discovery production; review research material for depositions.	2.50 575.00/hr	1,437.50
9/12/2014	JL Meeting with client and trial team in Mayfield NY (Smith, Bauza and legal asst) in preparation for trial	4.00 575.00/hr	2,300.00
JL	POV from 111 Broadway NYC to 467 Bunker Hill Road, Mayfield, NY for trial planning session with client	4.00 287.50/hr	1,150.00
9/13/2014	JL Meeting with client at Bunker Hill, Mayfield, NY.	7.50 575.00/hr	4,312.50
9/14/2014	JL POV (smith) from 467 Bunker Hill Road, Mayfield, NY (trial planning session with client and trial team) to NYC	4.00 287.50/hr	1,150.00
JL	Meeting with client in Mayfield, NY. for trial prep with trial team	4.00 575.00/hr	2,300.00
9/15/2014	JL Review discovery materials produced by City Defendants; conferred with LE expert Eterno by telephone; and conference call with LE experts.	2.50 575.00/hr	1,437.50
9/16/2014	JL Review and consult re: expert discovery.	2.50 575.00/hr	1,437.50
9/17/2014	JL Prepare for Hearing; hearing with Judge Sweet courtroom at 500 Pearl Street, NYC.	3.00 575.00/hr	1,725.00
9/18/2014	JL Prepare for City 30(b)(6) examination before trial on Friday; prepare for motion for summary judgment; defendants expert disclosure due.	2.50 575.00/hr	1,437.50
9/19/2014	JL With Smith: City 30(b)(6) deposition with Sgt Purpi; and City 30(b)(6) witness on gun amnesty program.	2.75 575.00/hr	1,581.25
9/21/2014	JL Prepare ER expert for examination before trial; confer w/Smith re med experts	2.75 575.00/hr	1,581.25
9/22/2014	JL ER and Psych Expert deposition preparation (2.00); review defendants' expert reports (2.00).	4.50 575.00/hr	2,587.50

Schoolcraft

Page 17

			<u>Hrs/Rate</u>	<u>Amount</u>
9/23/2014 JL	Expert deposition with Dr. Lubit at MCB 220 East 42nd Street, NYC.	7.50 575.00/hr	4,312.50	
9/24/2014 JL	Expert deposition: Review Lubit deposition; review defendants' expert reports; prepare for LE experts.	1.50 575.00/hr	862.50	
9/25/2014 JL	Discuss and prepare documentation for LE Expert depositions.	2.00 575.00/hr	1,150.00	
9/29/2014 JL	Prepare (w/Smith) Dr. Halpern-Ruder for examination before trial at 330 East 42nd Street, NYC.	2.00 575.00/hr	1,150.00	
9/30/2014 JL	Expert deposition with Dr. Halpern-Ruder at MCB.	7.50 575.00/hr	4,312.50	
10/1/2014 JL	Prepare for hearing on defendants' motions (1.25); hearing on city and hospital defendants' motions (.75); review of rulings from hearing (.25); prep production of LE expert resource materials (.75).	3.00 575.00/hr	1,725.00	
10/2/2014 JL	Prepare for summary judgment motions (1.25); summarize examination before trial (1.00); review LE expert resource materials for production (1.50); prepare and schedule legal assistants (Jeanette and Lysia) for examination before trial summaries (2.50).	6.25 575.00/hr	3,593.75	
10/3/2014 JL	Case conference with client and Smith; preparation for summary judgment motions; prepare research for motion to amend complaint.	3.75 575.00/hr	2,156.25	
10/6/2014 JL	Review of discovery correspondence and scheduling of remaining depositions.	1.50 575.00/hr	862.50	
10/10/2014 JL	Tel Conference with Lubit and Silverman re: schedule and prepare for deposition.	1.00 575.00/hr	575.00	
10/14/2014 JL	Meet Nat Smith for meeting with LE expert Eterno; drive to and from Molloy College from NYC to discuss expert report and prepare for Dr. Eterno for examination before trial. [mtg:2:30] [travel: 2:00]	2.50 575.00/hr	1,437.50	
JL	POV (Nat Smith) to and from Molloy College from NYC for meeting with LE expert Eterno; to discuss expert report and prepare for Dr. Eterno for examination before trial.	2.00 287.50/hr	575.00	
10/15/2014 JL	Conference w/Smith re: City Defendants settlement proposal; prepare counter proposal.	2.00 575.00/hr	1,150.00	
10/16/2014 JL	Conference with client and Smith re: settlement options and trial strategy.	1.50 575.00/hr	862.50	
10/17/2014 JL	Examination before trial of Dr. Eterno (with Smith)	8.50 575.00/hr	4,887.50	

Schoolcraft

Page 18

			<u>Hrs/Rate</u>	<u>Amount</u>
10/20/2014 JL	Meeting (conference call) with client and Smith re City settlement possibilities	0.75 575.00/hr	431.25	
10/22/2014 JL	Review of 2nd Amended Complaint; research for proposed 3rd Amendment.	1.50 575.00/hr	862.50	
10/23/2014 JL	Prepare and review summaries of deposition transcripts; schedule remaining depositions with counsel; prepare Silverman for deposition.	3.50 575.00/hr	2,012.50	
10/24/2014 JL	Defend with Smith City's examination before trial of Silverman.	7.50 575.00/hr	4,312.50	
10/28/2014 JL	Review discovery issues outstanding and preparation for hearing 10/29/2014.	2.00 575.00/hr	1,150.00	
10/29/2014 JL	Hearing before Judge Sweet.	1.00 575.00/hr	575.00	
11/3/2014 JL	Telephone conference with Smith re: 3rd Amended Complaint.	0.75 575.00/hr	431.25	
11/6/2014 JL	Case conference with client and Smith; update re: strategy and outstanding discovery matters.	2.25 575.00/hr	1,293.75	
11/10/2014 JL	Defend with Smith Lubit examination before trial	4.00 575.00/hr	2,300.00	
11/13/2014 JL	Lubit deposition continued (defend plaintiff psych expert with Smith).	5.50 575.00/hr	3,162.50	
11/16/2014 JL	Review draft of 3rd Amended Complaint.	1.75 575.00/hr	1,006.25	
11/18/2014 JL	Review of legal assistant's work in summarizing deposition transcripts.	1.00 575.00/hr	575.00	
11/20/2014 JL	Follow up re: Lubit deposition and prep materials for trial testimony.	1.00 575.00/hr	575.00	
12/3/2014 JL	Review draft of 3rd Amended Complaint; review plaintiff motion for Summary Judgment and dismiss Mauriello counterclaim.	3.00 575.00/hr	1,725.00	
12/4/2014 JL	Review draft of 3rd Amended Complaint and motion v. Mauriello.	1.50 575.00/hr	862.50	
12/8/2014 JL	Review deposition summaries; research on motions for summary judgment; confer with Smith re preparation for opposition.	3.00 575.00/hr	1,725.00	
12/9/2014 JL	Research review for motion for summary judgment and opposition to Mauriello counterclaim.	2.00 575.00/hr	1,150.00	

Schoolcraft

Page 19

			<u>Hrs/Rate</u>	<u>Amount</u>
12/21/2014 JL	Draft and Review plaintiff motion summary judgment.	2.00 575.00/hr	1,150.00	
12/22/2014 JL	Review plaintiff motion for summary judgment.	1.50 575.00/hr	862.50	
1/3/2015 JL	Meeting with Nat Smith re: Summary Judgment motion.	1.75 575.00/hr	1,006.25	
1/5/2015 JL	Review of summary judgment motion; prepare response.	4.50 575.00/hr	2,587.50	
1/7/2015 JL	Meeting with Nat Smith and James McCutcheon re: review of Compstat DVD's.	1.50 575.00/hr	862.50	
1/8/2015 JL	Review and index CompStat DVD's (4.50); prepare response to summary judgment motion (4.00).	8.50 575.00/hr	4,887.50	
1/9/2015 JL	Review of Compstat DVD's (2.50); prep index. Meeting with Nat Smith re: summary judgment motion (2.00).	4.50 575.00/hr	2,587.50	
1/10/2015 JL	Review CompStat DVD's; prep index.	7.50 575.00/hr	4,312.50	
1/11/2015 JL	Review CompStat DVD's; telephone call re: CompStat DVD's; review CompStat DVD's.	8.25 575.00/hr	4,743.75	
1/12/2015 JL	CompStat DVD review.	6.50 575.00/hr	3,737.50	
1/13/2015 JL	Review and index CompStat DVD's.	6.00 575.00/hr	3,450.00	
1/14/2015 JL	Meeting re: summary judgment motion (2.00); CompStat DVD review (4.50).	6.50 575.00/hr	3,737.50	
1/15/2015 JL	Review and index CompStat DVD's.	6.75 575.00/hr	3,881.25	
1/19/2015 JL	Draft Response to Mauriello summary judgment motion (4.50); telephone call (Smith and McCutcheon)re: CompStat DVD review (.75); research for Response to Mauriello (1.50); meeting for summary judgment (1.25).	8.00 575.00/hr	4,600.00	
1/20/2015 JL	Review defendants Order re: TAC; prepare Summary Judgment Response Mauriello.	3.50 575.00/hr	2,012.50	
1/21/2015 JL	Research, review and drafting portions of plaintiff SJ mtn	7.00 575.00/hr	4,025.00	

Schoolcraft

Page 20

			<u>Hrs/Rate</u>	<u>Amount</u>
1/22/2015 JL	Draft and research for Responses to Mauriello Summary Judgment motion.		7.50 575.00/hr	4,312.50
1/23/2015 JL	Review CompStat DVD's; prepare Summary Judgment Response Statement of motion and facts.		3.00 575.00/hr	1,725.00
1/24/2015 JL	Research and draft Responses to defendant Mauriello Summary Judgment motion.		3.50 575.00/hr	2,012.50
1/25/2015 JL	Research and Drafting in collab with Smith plaint SJ mtn		4.00 575.00/hr	2,300.00
1/26/2015 JL	Client conference call (1.50); research and drafting re: summary judgment defendant Mauriello (7.00).		8.50 575.00/hr	4,887.50
1/27/2015 JL	Meeting / consult with Smith re: summary judgment responses (2.00); research re: summary judgment response Mauriello (4.00).		6.00 575.00/hr	3,450.00
1/28/2015 JL	Research and draft; prepare for summary judgment response Mauriello.		10.50 575.00/hr	6,037.50
1/29/2015 JL	Mauriello response and research, record, and draft.		4.75 575.00/hr	2,731.25
1/30/2015 JL	Summary Judgment response, research, and draft.		2.00 575.00/hr	1,150.00
1/31/2015 JL	Prepare, research, write draft for response to Mauriello summary judgment.		8.50 575.00/hr	4,887.50
2/1/2015 JL	Confer with Smith in final draft: Mauriello Summary Judgment Response and review.		4.50 575.00/hr	2,587.50
2/2/2015 JL	Telephone conference withSmith and client; meeting re: summary judgment motions and trial. Trial Memo review. [client to reinstate Norinsberg et al to trial team]		4.50 575.00/hr	2,587.50
2/3/2015 JL	Meeting with Nat re: summary judgment motion; summary judgment Mauriello research.		3.50 575.00/hr	2,012.50
2/4/2015 JL	Meeting with Nat re: summary judgment motions.		1.00 575.00/hr	575.00
2/5/2015 JL	Research and draft response to defendant Mauriello motion for summary judgment; Mauriello summary judgment motion reponse.		7.50 575.00/hr	4,312.50
2/6/2015 JL	Research and draft Summary judgment motion.		7.50 575.00/hr	4,312.50
2/7/2015 JL	Review and draft Summary Judgment Motions.		6.50 575.00/hr	3,737.50

Schoolcraft

Page 21

			<u>Hrs/Rate</u>	<u>Amount</u>
2/8/2015 JL	Preparation in opposition to defendant's summary judgment motion.	8.50 575.00/hr	4,887.50	
2/9/2015 JL	Summary Judgment motions; confer w/Smith re prepare in opposition to motions and response to Rule 56.1 Statement.	9.50 575.00/hr	5,462.50	
2/10/2015 JL	Prepare memorandum in opposition to defendant's motions for summary judgment and Rule 56.1 Statement.	8.50 575.00/hr	4,887.50	
2/11/2015 JL	Review and edit of opposition to defendant's summary judgment motion.	6.50 575.00/hr	3,737.50	
2/12/2015 JL	Telephone conference with co-counsel; review of summary judgment motions by defendants.	2.50 575.00/hr	1,437.50	
2/13/2015 JL	Review of defendant's motions in opposition to plaintiff's motion for summary judgment; review of defendant's motions and prepare for plaintiff's reply re: Schoolcraft discovery.	2.00 575.00/hr	1,150.00	
2/17/2015 JL	Review of defendant Mauriello's motion and prepare plaintiff reply.	2.50 575.00/hr	1,437.50	
2/18/2015 JL	Review and research on plaintiff reply memorandum to defendant Mauriello's response motion.	3.00 575.00/hr	1,725.00	
2/19/2015 JL	Review of examination before trial summaries.	1.00 575.00/hr	575.00	
2/20/2015 JL	Prepare for meeting with new trial team; meet with Norinsberg trial team; and review draft of trial memo.	4.50 575.00/hr	2,587.50	
2/23/2015 JL	Review of Mauriello summary judgment motion response; research and review documents for summary judgment reply.	3.00 575.00/hr	1,725.00	
2/24/2015 JL	Review discovery to draft response to Mauriello motion opposition.	2.50 575.00/hr	1,437.50	
2/25/2015 JL	Draft and research for reply to Mauriello summary judgment response motion.	2.00 575.00/hr	1,150.00	
2/26/2015 JL	Review of Rule 56.1 Mauriello.	2.50 575.00/hr	1,437.50	
2/28/2015 JL	Review of Mauriello Rule 56.1.	1.50 575.00/hr	862.50	
3/2/2015 JL	Review and draft summary judgment motion; reply to defendant's motion.	2.25 575.00/hr	1,293.75	
3/3/2015 JL	Research and review of defendants motions and summary judgment statements re: re-preparation w/Smith of reply brief.	6.50 575.00/hr	3,737.50	

Schoolcraft

Page 22

			<u>Hrs/Rate</u>	<u>Amount</u>
3/4/2015 JL	Review of case file and research for smmary judgment motion reply brief.		7.25 575.00/hr	4,168.75
3/5/2015 JL	Draft, discuss and review summary judgment motion.		8.50 575.00/hr	4,887.50
3/6/2015 JL	Review and edit of summary judgment reply.		3.50 575.00/hr	2,012.50
3/9/2015 JL	Research and draft letter to Court re: Matthews.		2.50 575.00/hr	1,437.50
3/10/2015 JL	Telephone conference with Nat.		0.50 575.00/hr	287.50
3/11/2015 JL	Meeting with Nat Smith re: Matthews letter and response; trial strategy.		2.50 575.00/hr	1,437.50
3/12/2015 JL	Review motions; prepare letter to court. re; Matthews and quantified immunity. Meeting with Norinsberg team at 225 BWay		4.50 575.00/hr	2,587.50
3/13/2015 JL	Smith meeting at 111 Broadway for review of trial strategy and rewponsibilities with new team.		2.50 575.00/hr	1,437.50
3/16/2015 JL	Review motion response re: Lamstein Affidavit and repy to attorney motion.		2.50 575.00/hr	1,437.50
3/18/2015 JL	Review of trial; prepare exhibits.		0.50 575.00/hr	287.50
3/22/2015 JL	Trial exhibits preparation.		1.50 575.00/hr	862.50
3/23/2015 JL	Meeting with Nat MSith at 100 Wall Street; prepare trial exhibits and witness list.		4.50 575.00/hr	2,587.50
3/24/2015 JL	Draft/prepare jury verdict sheet template. Research re jury instruction re elements of complaint.		4.50 575.00/hr	2,587.50
3/25/2015 JL	Review of of trial preparation - especially Lubit Direct Outline.		2.50 575.00/hr	1,437.50
3/27/2015 JL	Telephone conference with new trial team; assign witness; complete jury questions round up; compstat video by Wednesday.		2.00 575.00/hr	1,150.00
3/28/2015 JL	Update Trial Memo		1.50 575.00/hr	862.50
3/29/2015 JL	Prepare expert witness direct; draft jury instruction round up.		4.75 575.00/hr	2,731.25

Schoolcraft

Page 23

			<u>Hrs/Rate</u>	<u>Amount</u>
3/30/2015 JL	Trial preparation; expect witness direct - Eterno, Lubit, Halpren-Ruder.	6.00 575.00/hr	3,450.00	
3/31/2015 JL	Prepare trial examination - Eterno, Lubit, and Halpren-Ruder.	6.50 575.00/hr	3,737.50	
4/1/2015 JL	Prepare expert witness testimony and trial notebook.	6.50 575.00/hr	3,737.50	
4/2/2015 JL	Meeting with trial team; research expert testimony for direct testimony and prep for cross.	5.00 575.00/hr	2,875.00	
4/3/2015 JL	Research and prepare expert witness; direct and cross	4.50 575.00/hr	2,587.50	
4/4/2015 JL	Trial memo preparation.	2.00 575.00/hr	1,150.00	
4/6/2015 JL	Prepare expert trial testimony for Eterno; review examination before trial for Eterno.	3.50 575.00/hr	2,012.50	
4/7/2015 JL	Prepare trial testimony for Halpren-Ruder; review jury instructions and motion.	4.25 575.00/hr	2,443.75	
4/8/2015 JL	Review of trial exhibits for expert witnesses Eterno and Halpren-Ruder; prepare expert testimony for Halpren-Ruder.	3.00 575.00/hr	1,725.00	
4/9/2015 JL	Expert trial preparation for Eterno; outline direct and prepare exhibits.	4.50 575.00/hr	2,587.50	
4/10/2015 JL	Prepare expert trial testimony for Halpren-Ruder; expert witness preparation for Lubit.	4.25 575.00/hr	2,443.75	
4/11/2015 JL	Prepare Eterno direct, with exhibits	2.50 575.00/hr	1,437.50	
4/13/2015 JL	Prepare for hearing before Judge Sweet re: trial schedule; meeting with trial team re: trial schedule and strategy.	3.50 575.00/hr	2,012.50	
4/15/2015 JL	Review of additional discovery by City Defendants re: Lamstein.	1.50 575.00/hr	862.50	
4/17/2015 JL	Review of City Proposal for settlement; telephone call to Schoolcraft re: City Settlement offer.	1.50 575.00/hr	862.50	
4/24/2015 JL	Telephone conference with Nat Smith re possible settlement strategy	0.50 575.00/hr	287.50	
4/28/2015 JL	Telephone conference with Nat Smith; call to Roy Lubit re: trial schedule.	1.25 575.00/hr	718.75	

Schoolcraft

Page 24

			<u>Hrs/Rate</u>	<u>Amount</u>
5/1/2015 JL	Telephone conference with Nat Smith re trial responsibilities, tactics and overall strategy	0.75 575.00/hr	431.25	
5/5/2015 JL	Review / discussion of court's 200 page Opinion re: Summary Judgment Motions.	3.00 575.00/hr	1,725.00	
5/6/2015 JL	Review and discuss with Smith plaintiff response re court's Opinion.	2.50 575.00/hr	1,437.50	
5/11/2015 JL	Prepare for hearing re: Court's Opinion/Order re: dispositive motions.	2.50 575.00/hr	1,437.50	
5/12/2015 JL	Meeting with full trial team re: hearing; status conference with Judge Sweet.	1.75 575.00/hr	1,006.25	
6/1/2015 JL	Research and draft letter motion re: reconsideration of order re: modified complaint.	5.75 575.00/hr	3,306.25	
6/2/2015 JL	Review of draft and additional research re: court motion to reconsider re: Dr HR; review draft of reconsideration letter and motion.	2.00 575.00/hr	1,150.00	
6/22/2015 JL	Discussion re: opposition to city & summary motions to reconsideration (Nat Smith).	0.75 575.00/hr	431.25	
6/23/2015 JL	Discussion with Nat Smith re: opposition to consideration motions.	0.50 575.00/hr	287.50	
6/24/2015 JL	Prepare opposition response re bifurcation.	1.50 575.00/hr	862.50	
6/25/2015 JL	Draft and research re: bifurcation issue.	7.50 575.00/hr	4,312.50	
6/26/2015 JL	Research and draft plaintiff opposition to bifurcation of Monell claim.	4.50 575.00/hr	2,587.50	
6/27/2015 JL	Further research and draft of plaintiff opposition to bifurcation motion; finalize draft of opposition to bifurcation.	4.00 575.00/hr	2,300.00	
7/6/2015 JL	Review draft of opposition memo for reconsideration.	0.75 575.00/hr	431.25	
7/8/2015 JL	Research re: production of plaintiff PD expert to city defendants.	2.50 575.00/hr	1,437.50	
7/9/2015 JL	Confer with expert; Draft response to city re: plaintiff expert resource material; review police expert disclosure requirements.	5.75 575.00/hr	3,306.25	
7/13/2015 JL	Response to city defendants request for additional discovery re: PD experts.	2.50 575.00/hr	1,437.50	

Schoolcraft

Page 25

			<u>Hrs/Rate</u>	<u>Amount</u>
7/14/2015 JL	Review / research of JHMC Opposition Memo re: Halpren-Ruder.	2.00 575.00/hr	1,150.00	
7/15/2015 JL	Prepare response to defendant JHMC Memo in Opposition to motion for reconsideration re: expert Halpren-Ruder.	5.50 575.00/hr	3,162.50	
7/17/2015 JL	Discussion and review re: Compstat Records; PD expert disclosure.	1.25 575.00/hr	718.75	
7/20/2015 JL	Draft opposition to JHMC Memorandum re Medical Expert Halpren-Ruder.	5.00 575.00/hr	2,875.00	
7/22/2015 JL	Prepare Response to JHMC Opposition to Plaintiff Medical Expert.	4.25 575.00/hr	2,443.75	
7/23/2015 JL	Research and draft Memo In Response to JHMC opposition memo; review film re: Schoolcraft.	7.50 575.00/hr	4,312.50	
7/24/2015 JL	Meeting with trial team re JPTO etc. at 100 Wall Street.	2.25 575.00/hr	1,293.75	
7/27/2015 JL	Review documentary film on client with Eterno.	0.75 575.00/hr	431.25	
8/7/2015 JL	Review JPTO's filed by defendants; telephone conference with counsel team re: JPTO; conference with co-counsel re: Trial Draft.	3.50 575.00/hr	2,012.50	
8/14/2015 JL	Meeting with Smith re JPTO	1.00 575.00/hr	575.00	
8/21/2015 JL	Draft letter to court re experts at trial.	1.00 575.00/hr	575.00	
8/24/2015 JL	Review of trial exhibits, expert rpts and EBTs; prepare expert trial witness outlines	6.50 575.00/hr	3,737.50	
8/25/2015 JL	Review and edit letter to court re: opposition to city defendants 2 letters; witness trial outlines: Eterno.	2.00 575.00/hr	1,150.00	
8/26/2015 JL	Prepare witness trial outlines.	3.50 575.00/hr	2,012.50	
9/16/2015 JL	Confer with trial team re City R 68 offer of jmt;	2.50 575.00/hr	1,437.50	
For professional services rendered				1310.00
				\$736,575.00
Balance due				<u><u>\$736,575.00</u></u>